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June 25, 2002

**Via E-Mail and Overnight Carrier**

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
Commonwealth of Massachusetts  
One South Station, 2<sup>nd</sup> Floor  
Boston, Massachusetts 02110

**Re:** Proceeding By the Department of Telecommunications and Energy on  
Its Own Motion to Develop Requirements for Mass Migrations of  
Telecommunications Service End-Users  
Docket No. D.T.E. 02-28

Dear Secretary Cottrell:

Enclosed herewith for filing please find an original and one (1) copy of the attached Petition of RCN-BECOCOM, LLC for Leave to Intervene as a party in the above-captioned proceeding and a Motion of Counsel to Appear *Pro Hac Vice*.

Very truly yours,

Philip J. Passanante

Enclosure

cc: DTE Electronic Filing System ([dte.efiling@state.ma.us](mailto:dte.efiling@state.ma.us))  
Paula Foley ([Paula.Foley@state.ma.us](mailto:Paula.Foley@state.ma.us))

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Proceeding By the Department of Telecommunications	)	
and Energy on Its Own Motion to Develop Requirements	)	D.T.E. 02-28
for Mass Migrations of Telecommunications	)	
Service End Users	)	
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**PETITION TO INTERVENE OF  
RCN-BECOCOM, LLC**

RCN-BECOCOM, LLC ("RCN" or the "Company"), a Massachusetts limited liability company, duly certified to provide telecommunications services in the Commonwealth of Massachusetts (the "Commonwealth" or "Massachusetts") by virtue of its Registration/Statement of Business Operations and tariff filed in January 1997, hereby petitions, pursuant to 220 C.M.R. Sec. 1.03, to intervene as a party in the above-referenced proceeding.

As grounds for this Petition, RCN respectfully states as follows:

1. The Company provides telecommunications services in the Commonwealth as a competitive telecommunications provider. In today's dynamic telecommunications marketplace it is likely that, as certificated carriers exit the Massachusetts marketplace or any portion thereof, such changes will be business affecting and will have an impact on RCN's service offerings in the Commonwealth. Accordingly, RCN's interests might be impacted by the Department's review and decision in this docket.

2. RCN requests that all filings in connection with this proceeding be served on counsel

and also be served on the following individual:

Patrick McGuire  
RCN Telecom Services, Inc.  
105 Carnegie Center, Third Floor  
Princeton, New Jersey 08540  
Phone: (609) 919-8247  
Fax: (609) 734-6167  
E-mail: [patrick.mcguire@rcn.net](mailto:patrick.mcguire@rcn.net)

WHEREFORE, RCN respectfully requests leave to intervene in this proceeding.

Respectfully submitted,

RCN-BECOCOM, LLC

By \_\_\_\_\_

Philip J. Passanante  
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Dated: June 25, 2002

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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**MOTION OF COUNSEL TO APPEAR *PRO HAC VICE***

I hereby respectfully apply to appear as counsel *pro hac vice* in the above-captioned proceeding. I am a member in good standing of the Bar of the State of New Jersey.

Respectfully submitted,

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